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5 [Additional Counsel Appear on Signature Page]

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7 UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9

10 BUCKEYE TREE LODGE AND SEQUOIA  
11 VILLAGE INN, LLC, a California limited  
liability company, and 2020 O STREET  
12 CORPORATION, INC, D/B/A THE  
MANSION ON O STREET, individually and  
13 on behalf of themselves and all others  
similarly situated,

14 Plaintiffs,

15 vs.

16 EXPEDIA, INC., a Washington corporation;  
17 HOTELS.COM, L.P., a Texas limited  
partnership; HOTELS.COM GP, LLC, a  
18 Texas limited liability company; ORBITZ,  
LLC, a Delaware limited liability company;  
19 VENERE NET S.R.L DBA VENERE NET,  
LLC, an Italian limited liability company; and  
20 EXPEDIA AUSTRALIA INVESTMENTS  
PTY LTD., an Australian private company,

21 Defendants.  
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Case No. 3:16-CV-04721-VC

**CLASS ACTION**

**DECLARATION OF TONY C. RICHIA IN  
SUPPORT OF PLAINTIFFS'  
UNOPPOSED MOTION FOR  
APPROVAL OF CLASS ACTION  
SETTLEMENT, ATTORNEY'S FEES,  
AND INCENTIVE AWARDS**

Date: March 25, 2021  
Time: 2:00 p.m.  
Ctmm: 4, 17<sup>th</sup> Floor  
Judge: Hon. Vince Chhabria

1 I, Tony C. Richa, hereby declare;

2 1. I have been admitted *pro hac vice* in this case and I am admitted to practice in the  
3 State of Maryland. I am the Managing Member of Richa Law Group, P.C. in Bethesda,  
4 Maryland.

5 2. I represent Plaintiffs Buckeye Tree Lodge and Sequoia Village Inn, LLC, 2020 O  
6 Street Corporation, Inc. D/B/A The Mansion on O Street, Prospect Historic Hotel, and Shiloh  
7 Morning Inn, LLC in the above-captioned lawsuit. I submit this declaration in support of  
8 Plaintiffs' Unopposed Motion for Approval of Class Action Settlement. The testimony set forth  
9 herein is based on first-hand knowledge about which I would and could testify competently in  
10 open court if called upon to do so, and on contemporaneously-generated records kept in the  
11 ordinary course of law practice by either my firm or other Class Counsel firms.  
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13 3. The total number of hours I spent on this litigation is 725.40 hours at the rate of  
14 Five Hundred Dollars (\$500.00) per hour for a lodestar of \$362,700. Tasks completed include,  
15 but are not limited to, the following:  
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17 18 19 20 21	<u>Pre-suit Investigation</u> : Conduct client and witness meetings and interviews; Conduct legal research and analysis of claims; Review client documents; Research Defendants' practices; Perform searches and screen captures of hotels that appear on Defendants' websites; Begin drafting complaint.	29.95 hours
22 23 24 25 26 27 28	<u>Discovery</u> : Propound and respond to written discovery including document requests, interrogatories, requests for admissions, and deposition notices; prepare witnesses for depositions; defend depositions; review and analyze documents produced by defendants; review and analyze client documents for production to defendants; meet and confer regarding discovery; continue investigation of defendants' ongoing practices with respect to Class Member hotels.	608.9 hours

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2	<u>Motion Practice/Pleadings/Research:</u>	35.5 hours
3	Assisted with the drafting, review, and	
4	revision of discovery motion papers including	
5	motions to dismiss, motions to strike, motions	
6	for class certification, oppositions, motions	
	for summary judgment, injunction, and	
	amended and consolidated complaints as well	
	as memorandums in support of motions.	
7	<u>Expert Witnesses:</u> Research and interview	1.6 hours
8	potential experts; work with experts to	
	develop analyses and reports.	
9	<u>Mediation / Settlement:</u> Participate in Court-	39.6 hours
10	ordered ADR program; participate in ongoing	
11	settlement negotiations and strategies; prepare	
12	for and attend mediations with private	
13	mediator at JAMS; prepare for and attend	
	Court-ordered settlement conference; drafting	
	injunction.	
14	<u>Case Management:</u> Meet and confer with co-	9.85 hours
15	counsel and opposing counsel over various	
16	management and scheduling issues;	
	conference calls; develop case strategy.	

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18 4. My current rates are appropriate in light of prevailing rates for similar legal

19 services provided by lawyers of reasonably comparable skill, experience, and reputation. The

20 time reflected in my firm's time report was time actually spent, in the exercise of reasonable

21 judgment. I was careful not to expend any unnecessary hours and not duplicate the work of

22 others.

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3 I declare under penalty of perjury under the laws of the United States of America and the  
4 State of California that the foregoing is true and correct to the best of my knowledge.  
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6 Executed this 24<sup>th</sup> day of February 2021, in Bethesda, Maryland.  
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